

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	CRIMINAL NO. 4:22-CR-612
	§	
TOM COOPERMAN	§	
	§	

**MOTION FOR TEMPORARY RETURN
OF PASSPORT AND PERMISSION TO TRAVEL**

TO THE HONORABLE JUDGE ANDREW S. HANEN:

COMES NOW, Tom Cooperman and hereby requests this Court allow the temporary return of his passport and permission to travel to Lafayette, Louisiana and Cancun, Mexico on separate occasions.

I.

Mr. Cooperman requests permission to travel from Houston to Lafayette, LA on February 16, 2023, and return to Houston on February 18, 2023. Mr. Cooperman will be driving with his fiancé to Lafayette for a family function. He will stay at a residence owned by his fiancé (305 W. Second St., Lafayette, 70501).

II.

Next, Mr. Cooperman is scheduled to fly from Houston to Cancun, Mexico on February 24, 2023, where he will be staying at the Delek Tulum (Carretera Tulum, Boca Paila, K.M. 7, Zoina Hotelera, C.P. 77780). Mr. Cooperman will be meeting with event planners and touring potential wedding venues with his fiancé. They will return to Houston on February 28, 2023.

III.

Mr. Cooperman's passport was collected by and is currently being held in the custody of Pretrial Services, in relation to Mr. Cooperman's release on condition of bond. Mr. Cooperman requests permission to pick-up his passport from Pretrial Services on or after February 22, 2023 and return the passport to Pretrial Services by March 2, 2023.

IV.

Mr. Cooperman remains in perfect standing with Pretrial Services. He will provide his pretrial officer his full itinerary, including flight and lodging information.

WHEREFORE PREMISES CONSIDERED, Mr. Cooperman respectfully requests this Court allow the temporary return of his passport and travel as requested herein.

Respectfully Submitted,

/s/ Chip Lewis
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CERTIFICATE OF CONFERENCE

On February 5, 2023, counsel for Defendant conferred with Scott Armstrong concerning their position on Defendant's Motion for Temporary Return of Passport and Permission to Travel and he advised: the Government is UNOPPOSED to the Lafayette travel but OPPOSED to the Mexico travel.

/s/ Chip Lewis
CHIP LEWIS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Defendant's Motion for Temporary Return of Passport and Permission to Travel has been forward via electronic mail to the Government on this the 5th day of February 2023.

/s/ Chip Lewis
CHIP LEWIS